

# EXHIBIT A

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
6/16/2003	Savage, Joseph	380.00	0.10	38.00	Telephone conference with Porter concerning discharge and possible claim.
6/17/2003	Savage, Joseph	380.00	2.70	1,026.00	Telephone conference with A. Forman (Testa labor department); emails to/from A. Forman; conference with Porter re: facts of barring.
6/20/2003	Savage, Joseph	380.00	0.30	114.00	Telephone conference with S. Porter re: facts of barring and relevant statutes.
6/24/2003	Savage, Joseph	380.00	0.20	76.00	Telephone conference with S. Porter re: § 1983 claim and barring.
6/24/2003	Goddard, Jennifer	240.00	0.50	120.00	Meeting with J. Savage regarding possible § 1983 claim and strategy.
6/25/2003	Goddard, Jennifer	240.00	2.50	600.00	Review documents from Sheila; draft demand letter to Suffolk Sheriff's Department.
6/26/2003	Goddard, Jennifer	240.00	0.10	24.00	Continue drafting and revising demand letter.
6/27/2003	Goddard, Jennifer	240.00	4.00	960.00	Prepare for and have meeting with Sheila.
7/2/2003	Savage, Joseph	380.00	0.20	76.00	Review letter to Cabral re: barring and request for relief.
7/7/2003	Savage, Joseph	380.00	0.20	76.00	Telephone conference with S. Porter; email S. Porter concerning follow-up to barring.
7/13/2003	Savage, Joseph	380.00	2.50	950.00	Telephone conference with S. Porter re: facts of barring; update re: factual inquiry
7/14/2003	Savage, Joseph	380.00	0.30	114.00	Send letter to Cabral et al; telephone conference with S. Porter; email S. Porter re: status of demand, likely next steps.
7/14/2003	Goddard, Jennifer	240.00	0.10	24.00	Finalize and send demand letter to HOC.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
7/28/2003	Goddard, Jennifer	240.00	2.00	480.00	Office conference with J. Savage regarding strategy relating to § 1983 suit; meeting with Sheila and Joe regarding same.
7/30/2003	Goddard, Jennifer	240.00	0.20	48.00	Draft follow up letter to HOC requesting response to demand letter and personnel file.
8/5/2003	Goddard, Jennifer	240.00	0.20	48.00	Begin drafting Complaint (§ 1983 portion).
8/22/2003	Goddard, Jennifer	240.00	2.70	648.00	Continue drafting and revising Complaint (§ 1983 portion); telephone call with Sheila regarding same and status; review HOC documents for same.
9/4/2003	Goddard, Jennifer	240.00	1.60	384.00	Meeting with J. Savage regarding strategy for Complaint and comments to same; conference call with JFS and Sheila regarding strategy and status; continue to revise Complaint; revising Complaint with Porter's comments.
9/6/2003	Savage, Joseph	380.00	0.10	38.00	Review draft Complaint (§ 1983 portion).
9/8/2003	Goddard, Jennifer	240.00	0.40	96.00	Emails with SP regarding status/strategy issues; conference with JFS regarding same; revise draft Complaint.
9/25/2003	Goddard, Jennifer	240.00	1.10	264.00	Continue revising Complaint; review additional docs from SP; emails and t/c with SP regarding her decision to take Essex NP position; advise re: law on mitigation of damages.
10/7/2003	Goddard, Jennifer	240.00	0.10	24.00	Calculate potential damages to be recovered (§ 1983 portion).
1/12/2004	Goddard, Jennifer	240.00	0.10	24.00	Emails with Sheila regarding new job interview
9/8/2004	Goddard, Jennifer	240.00	0.50	120.00	Attend to service issues; t/c the process server regarding proper parties to serve

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9/20/2004	Goddard, Jennifer	240.00	0.40	96.00	Review transcript of Sheriff's debate for information regarding SP.
9/23/2004	Goddard, Jennifer	240.00	0.10	24.00	Strategize regarding anticipated deponents and other discovery items; meeting with JFS regarding same and overall case strategy (re: § 1983 portion).
10/21/2004	Goddard, Jennifer	240.00	0.50	120.00	Review and revise opposition to motion to dismiss; draft settlement proposals to defendants.
10/25/2004	Goddard, Jennifer	240.00	1.10	264.00	Continue revising settlement proposals; continue revising opposition to motion to dismiss; review research for same; conferences with MMJ and JB regarding same; review Baron decisions; draft outline of discovery schedule and other strategic matters for attorney conference.
10/26/2004	Goddard, Jennifer	240.00	0.80	192.00	Continue revising opposition to motion to dismiss and reviewing research regarding same; conference with JFS regarding comments to opposition, strategy regarding discovery and settlement, conferences with MMJ and JB regarding follow-up for opposition to dismiss; v-mail to Sheila regarding status.
10/27/2004	Goddard, Jennifer	240.00	1.00	240.00	T/c with Sheila regarding settlement, ADR status and strategy; t/c with Ellen C. regarding discovery issues; conferences with JFS regarding same.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
10/28/2004	Goddard, Jennifer	240.00	2.00	480.00	T/c's government counsel regarding discovery plan and agenda for court conference; t/c Sheila regarding same; revise joint statement; conferences JFS, MMJ and JB regarding same and discovery matters.
11/2/2004	Goddard, Jennifer	240.00	0.10	24.00	Prepare for motion to dismiss hearing.
11/2/2004	Savage, Joseph	380.00	0.10	38.00	Review motion for judgment on pleadings; email to/from S. Porter.
11/13/2004	Savage, Joseph	380.00	2.00	760.00	Conference with S. Porter; conference with Judge Woodlock; court hearing re: motion to dismiss; review Amended Complaint plans.
11/16/2004	Goddard, Jennifer	240.00	0.40	96.00	Review/revise auto disclosure; conference JMB regarding revising same.
11/17/2004	Goddard, Jennifer	240.00	0.40	96.00	T/c Sheila regarding facts and answers for Auto Disclosures; conference with J. Burns regarding finalizing same; review same.
11/19/2004	Savage, Joseph	380.00	0.10	38.00	Email Porter; review auto disclosure.
12/1/2004	Goddard, Jennifer	240.00	0.20	48.00	Revise discovery requests and Amended Complaint.
12/3/2004	Savage, Joseph	380.00	0.10	38.00	Review House of Corrections disclosure.
12/14/2004	Goddard, Jennifer	240.00	0.20	48.00	Revise written discovery requests; conferences with JMB regarding same; review motion to dismiss and answer.
1/13/2005	Goddard, Jennifer	240.00	0.10	24.00	T/c Ellen C. regarding request for extension to respond to discovery.
<b>STARTING GOODWIN TIME</b>					
2/26/2005	Savage, Joseph	380.00	0.10	38.00	Telephone conference with Mr. McNeil re: obtaining information for § 1983 claim.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
3/1/2005	Savage, Joseph	380.00	0.50	190.00	Telephone conference with Mr. McNeil; email to and from Mr. Schumacher; email to and from Ms. Porter; review <i>Touhy</i> regulations.
3/2/2005	Schumacher, David	240.00	5.50	1,320.00	Telephone conference with client; review discovery responses; draft <i>Touhy</i> letter to Assistant United States Attorney.
3/7/2005	Schumacher, David	240.00	0.10	24.00	Draft and serve deposition notice
3/8/2005	Schumacher, David	240.00	1.40	336.00	Review Suffolk County documents; telephone conference with client; review client documents to respond to discovery requests.
3/10/2005	Schumacher, David	240.00	1.70	408.00	Draft responses to interrogatories (§ 1983 portion).
3/11/2005	Schumacher, David	240.00	2.30	552.00	Draft <i>Touhy</i> letter to FBI; draft memorandum regarding outline of proof.
3/11/2005	Savage, Joseph	380.00	0.20	76.00	Emails to and from Mr. Schumacher regarding <i>Touhy</i> letter.
3/13/2005	Schumacher, David	240.00	4.80	1,152.00	Draft responses to interrogatories; communications with client and Mr. Savage regarding same.
3/14/2005	Schumacher, David	240.00	5.80	1,392.00	Draft responses to interrogatories and document requests, review documents to produce.
3/15/2005	Schumacher, David	240.00	1.30	312.00	Interview Dr. Singletary re: SP work history/SCHOC policy; draft memorandum to file regarding same.
3/17/2005	Schumacher, David	240.00	0.70	168.00	Prepare interrogatory responses and document request responses.
3/17/2005	Savage, Joseph	380.00	0.10	38.00	Emails with Mr. Schumacher regarding interrogatories; review Singletary Report.
3/18/2005	Schumacher, David	240.00	0.40	96.00	Prepare interrogatory responses and document request responses
3/20/2005	Schumacher, David	240.00	3.20	768.00	Prepare interrogatory responses and document request responses

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3/20/2005	Savage, Joseph	380.00	0.20	76.00	Emails with Mr. Schumacher regarding Touhy regulations.
3/21/2005	Schumacher, David	240.00	5.10	1,224.00	Draft responses to discovery requests.
3/22/2005	Schumacher, David	240.00	3.20	768.00	Draft document responses; communications with Mrs. Porter regarding same
3/22/2005	Savage, Joseph	380.00	0.20	76.00	Telephone conference with Mr. Giedt re: <i>Touhy</i> ; email to and from Mr. Schumacher re: same.
3/23/2005	Schumacher, David	240.00	1.80	432.00	Prepare and file discovery responses.
3/23/2005	Sweet, James	240.00	1.50	360.00	Research grand jury secrecy and law enforcement privilege; draft memorandum regarding same in anticipation of questions and litigation about Mrs. Porter's communications with the FBI at and after Porter deposition.
3/25/2005	Schumacher, David	240.00	1.20	288.00	Draft supplemental Interrogatory responses; draft deposition notices; conference with Mr. Savage.
3/29/2005	Savage, Joseph	380.00	0.10	38.00	Telephone conference with Mr. Kiley regarding Ms. Mastrorilli.
3/31/2005	Schumacher, David	240.00	0.30	72.00	Telephone conference with client; telephone conference with Sheriff Rouse re: policy at HOC.
4/4/2005	Schumacher, David	240.00	0.20	48.00	Draft deposition notices; conference with Mr. Savage.
4/7/2005	Savage, Joseph	380.00	0.10	38.00	Email Mr. Schumacher; telephone conference with McNeil re: <i>Touhy</i> request.
4/8/2005	Schumacher, David	240.00	0.30	72.00	Telephone conference with opposing counsel regarding depositions and discovery.
4/15/2005	Schumacher, David	240.00	0.20	48.00	Conference with Mr. Savage regarding strategy; communications with opposing counsel regarding discovery.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
4/15/2005	Savage, Joseph	380.00	0.10	38.00	Telephone conference with Mr. McNeil re: <i>Touhy</i> and USAO opposition; review FBI opposition.
4/21/2005	Schumacher, David	240.00	2.00	480.00	Review motion for stay by Cabral, research for Opposition to stay for Fifth Amendment reasons.
4/22/2005	Schumacher, David	240.00	2.40	576.00	Research for opposition to motion for stay based on 5 <sup>th</sup> Amendment.
4/22/2005	Savage, Joseph	380.00	0.30	114.00	Emails with Mr. Schumacher; review motion for stay.
4/24/2005	Schumacher, David	240.00	6.60	1,584.00	Draft Opposition to motion for stay.
4/25/2005	Schumacher, David	240.00	5.30	1,272.00	Draft and file Opposition to motion for stay; prepare same.
4/26/2005	Schumacher, David	240.00	3.20	768.00	Prepare for hearing on motion to stay.
4/27/2005	Savage, Joseph	380.00	2.20	836.00	Attend hearing on motion to stay; prepare for same; emails regarding deposition schedule; deposition preparation.
5/1/2005	Savage, Joseph	380.00	0.30	114.00	Review section 1983 memorandum.
5/3/2005	Savage, Joseph	380.00	0.20	76.00	Review <i>Touhy</i> letter; email Mr. Schumacher.
5/4/2005	Schumacher, David	240.00	10.30	2,472.00	Prepare for Cabral deposition; deposition scheduling.
5/4/2005	Savage, Joseph	380.00	0.40	152.00	Telephone conference with Mr. McNeil; telephone conference with Mr. Schumacher; deposition preparation; review document produced; prepare and discuss <i>Touhy</i> request.
5/5/2005	Schumacher, David	240.00	9.60	2,304.00	Prepare for Cabral deposition; conference with Ms. Jurdak; memo to file re: same; conference with client.
5/5/2005	Savage, Joseph	380.00	2.90	1,102.00	Prepare for Cabral deposition; review document production; telephone conference with Mr. Schumacher.



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5/6/2005	Savage, Joseph	380.00	7.00	2,660.00	Deposition of Ms. Cabral; prepare for same.
5/9/2005	Schumacher, David	240.00	7.80	1,872.00	Prepare for Keeley deposition; research re: medical records; schedule depositions.
5/10/2005	Schumacher, David	240.00	8.10	1,944.00	Conference with Ms. Mastrorilli; review documents and testimony to prepare for Keeley deposition.
5/10/2005	Savage, Joseph	380.00	0.20	76.00	Telephone conference with Mr. Schumacher; telephone conference with Mr. Giedt re: <i>Touhy</i> .
5/11/2005	Schumacher, David	240.00	10.60	2,544.00	Conduct deposition of Ms. Keeley; prepare for same; communications with client and Mr. Savage regarding same.
5/12/2005	Schumacher, David	240.00	3.60	864.00	Prepare for Horgan deposition; schedule depositions; draft discovery deficiency letters.
5/13/2005	Schumacher, David	240.00	7.10	1,704.00	Conduct deposition of Gerard Horgan; prepare for same.
5/16/2005	Schumacher, David	240.00	4.00	960.00	Prepare for Porter deposition; review testimony and exhibits from previous depositions; research re: informant privilege.
5/16/2005	Savage, Joseph	380.00	0.30	114.00	Telephone conference with Mr. Schumacher; prepare for conference with Ms. Porter; review recently-decided Saugus s. 1983 case.
5/17/2005	Savage, Joseph	380.00	2.40	912.00	Conference with Mrs. Porter to prepare for deposition.
5/17/2005	Sweet, James	240.00	0.60	144.00	Research informant's privilege
5/18/2005	Schumacher, David	240.00	0.60	144.00	Prepare exhibit chart.

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5/18/2005	Savage, Joseph	380.00	7.60	2,888.00	Defend Porter deposition and prepare for same; telephone conference with Mr. Sinnott re: additional witnesses for § 1983 violations; telephone conference with Mr. Giedt re: <i>Touhy</i> opposition; conference with Mr. Schumacher re: same.
5/19/2005	Schumacher, David	240.00	2.40	576.00	Prepare exhibit chart for outline of proof; communications with Mr. Giedt regarding <i>Touhy</i> request; review recent memoranda on informer's privilege and § 1983.
5/19/2005	Savage, Joseph	380.00	2.10	798.00	Conference with Mr. Dolan et al.; review Baron decision; telephone conference with Mr. Schumacher; conference with Mr. Schumacher; telephone conference with Mr. Kiley re: Mastroilli; telephone conference with Mr. Gormley re: Paul Davis' pending § 1983 suit; review Cabral deposition; prepare continued Cabral deposition.
5/20/2005	Schumacher, David	240.00	4.10	984.00	Review testimony and documents to prepare for Viktor Theiss deposition.
5/20/2005	Savage, Joseph	380.00	1.20	456.00	Mr. Schumacher emails regarding <i>Touhy</i> letter and case analysis; review Cabral deposition; prepare Cabral deposition II.
5/21/2005	Savage, Joseph	380.00	0.90	342.00	Review Cabral deposition; telephone conference with Mr. Schumacher re: additional Cabral information.
5/22/2005	Savage, Joseph	380.00	0.40	152.00	Review additional discovery provided by Cabral; deposition preparation.
5/23/2005	Schumacher, David	240.00	3.30	792.00	Prepare for Theiss deposition.
5/23/2005	Savage, Joseph	380.00	0.20	76.00	Prepare for Ms. Porter's deposition.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
5/24/2005	Schumacher, David	240.00	7.80	1,872.00	Depose Viktor Theiss; prepare for same; communications with United States Attorney Office regarding Touhy request.
5/24/2005	Savage, Joseph	380.00	0.50	48.00	Prepare for Cabral deposition.
5/25/2005	Schumacher, David	240.00	6.90	1,556.00	Draft correspondence to opposing counsel and USAO; schedule depositions; telephone conference with client, opposing counsel and United States Attorney's Office; research; review Porter transcript
5/26/2005	Schumacher, David	240.00	0.20	48.00	Attend Ms. Porter's deposition; prepare for same
5/26/2005	Savage, Joseph	380.00	6.30	2,394.00	Prepare for and attend Ms. Porter's deposition; strategy meeting and emails w/Ms. Porter.
5/30/2005	Savage, Joseph	380.00	1.10	418.00	Review documents produced by Sheriff's Department
5/31/2005	Bapooji, Anita	240.00	2.00	480.00	Draft supplement to automatic disclosures; conference call with opposition counsel
6/1/2005	Schumacher, David	240.00	0.20	48.00	Draft deposition notices.
6/1/2005	Savage, Joseph	380.00	0.40	152.00	Review depositions; prepare depositions of Dacey, et al.
6/1/2005	Bapooji, Anita	240.00	0.40	96.00	Draft Supplemental R.26 Disclosure; email from client with names of witnesses
6/2/2005	Bapooji, Anita	240.00	1.30	312.00	Telephone calls with Ms. Caulo regarding depositions; voicemails to potential witnesses; draft letter with production of documents; emails with client regarding witnesses.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
6/3/2005	Bapooji, Anita	240.00	1.10	264.00	Telephone call with client; telephone call with USAO regarding affidavit; conferences with opposing counsel regarding discovery.
6/6/2005	Bapooji, Anita	240.00	0.40	96.00	Emails with Mrs. Porter regarding discovery
6/8/2005	Bapooji, Anita	240.00	2.30	552.00	Telephone calls with Mr. Giedt regarding FBI affidavit; telephone call with Suffolk District Attorney's office and Boston TV Station regarding subpoenas; drafting subpoenas; drafting document requests; voicemail and telephone call with Ms. Porter regarding medical records; drafting notices for subpoenas.
6/9/2005	Savage, Joseph	380.00	0.10	38.00	Review letter from Ms. Caulo.
6/9/2005	Bapooji, Anita	240.00	3.20	768.00	Telephone call with Mr. Giedt regarding FBI affidavit; telephone call with Ms. Caulo regarding discovery issues; telephone call with moderator for Cabral/Murphy debate; telephone call with Mr. Katz regarding FBI affidavit; read and circulate FBI affidavit; telephone call with Mr. DeMeo; emails with client regarding discovery issues; working on discovery issues
6/10/2005	Bapooji, Anita	240.00	2.90	696.00	Finalize document requests to Defendant Ms. Cabral and Suffolk; draft cover letter for same; conference with Mr. Savage regarding discovery issues and strategy; telephone call and voicemail with Ms. Caulo regarding motion to quash; email to Mr. Savage regarding same; email to Ms. Porter regarding Mr. DiMeo's deposition

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6/13/2005	Bapooji, Anita	240.00	0.70	168.00	Voicemail to Ms. Caulo regarding discovery issues; conference with Ms. Caulo regarding discovery issues; work on discovery issues.
6/14/2005	Savage, Joseph	380.00	1.20	456.00	Review Theiss records; review DOJ depositions; telephone conferences with Mr. Katz, Ms. Bapooji and Mr. Schumacher re: <i>Touhy</i> and FBI affidavit.
6/15/2005	Savage, Joseph	380.00	0.50	190.00	Preparation for Dacey deposition.
6/15/2006	Bapooji, Anita	240.00	0.80	192.00	Voicemail to Ms. Caulo; draft letter to Ms. Caulo regarding confidential designation; telephone call and email with Ms. Porter regarding depositions and records.
6/16/2005	Savage, Joseph	380.00	4.90	1,862.00	Take Dacey deposition; conference with Ms. Porter.
6/16/2005	Bapooji, Anita	240.00	2.10	504.00	Conferences with Ms. Porter regarding discovery issues; review tape of Ms. Cabral/Mr. Murphy debate; emails with Mr. Savage regarding discovery issues; work on discovery issues.
6/17/2005	Schumacher, David	240.00	4.10	984.00	Review motion to quash; review transcripts and documents to prepare for Jurdak and Tompkins depositions.
6/17/2005	Bapooji, Anita	240.00	0.20	48.00	Conferences with Mr. Savage, Mr. Schumacher and Mr. Sweet regarding motion to quash and discovery; review federal rules and calculate due dates for discovery items and motions.

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6/20/2005	Bapooji, Anita	240.00	0.80	192.00	Telephone calls with Mr. DiMeo; voicemail to Mr. DiMeo's attorney; email and telephone call with Ms. Caulo regarding deposition scheduling; telephone call with Ms. Porter regarding discovery and summary judgment issues
6/21/2005	Bapooji, Anita	240.00	0.80	192.00	Telephone call with Mr. DiMeo's attorney; revise DiMeo deposition outline; work on discovery matters; revise task list; read Ms. Porter's medical records and emails regarding same.
6/22/2005	Savage, Joseph	380.00	1.50	570.00	Review letter from Ms. Caulo; conference with Ms. Bapooji; telephone conference with Mr. McNeil re: <i>Touhy</i> ; deposition preparation.
6/22/2005	Bapooji, Anita	240.00	5.20	1,248.00	Prepare and take deposition of Mr. DiMeo; conferences with Ms. Porter on discovery and strategy issues; conferences with Ms. Caulo on discovery issues; read correspondence from Ms. Caulo regarding Ms. Powers and advice of counsel issues; work on discovery issues and emails with Mr. Savage regarding same.

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6/23/2005	Bapooji, Anita	240.00	4.50	1,080.00	Draft letter to Ms. Caulo regarding document requests; telephone call with Ms. Caulo regarding discovery issues; telephone calls with Mr. Giedt regarding Sullivan subpoena and Touhy request; prepare and draft Sullivan subpoena and Touhy request; emails with Mr. Schumacher and Mr. Savage regarding discovery issues; conference with Mr. Savage and emails with Mr. Schumacher regarding Ms. Powers and advice-of-counsel issue
6/24/2005	Savage, Joseph	380.00	5.90	2,242.00	Deposition of Cabral; review subpoena to Department of Justice; review damages chart.
6/24/2005	Bapooji, Anita	240.00	0.20	48.00	Conference with Ms. Porter regarding documents and Mr. DiMeo.
6/25/2005	Savage, Joseph	380.00	0.50	190.00	Prepare for Mastrorilli deposition.
6/26/2005	Savage, Joseph	380.00	2.30	874.00	Prepare for Mastrorilli deposition.
6/27/2005	Savage, Joseph	380.00	4.10	1,558.00	Mastrorilli deposition and prepare for same.
6/27/2005	Bapooji, Anita	240.00	2.10	504.00	Revise and send letters to Ms. Caulo regarding videotapes; arrange for production of Ms. Porter's medical records and conferences with Ms. Boivin regarding same; telephone calls with Ms. Porter and emails with Mr. Savage regarding medical testimony; revise second set of document requests; emails with Mr. Savage regarding same
6/28/2005	Schumacher, David	240.00	7.90	1,896.00	Take Steve Tompkins deposition; prepare for same; prepare 2nd set of discovery requests

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
6/28/2005	Bapooji, Anita	240.00	0.40	96.00	Emails with Mr. Savage and Mr. Schumacher regarding meeting and Dr. Clemente regarding Ms. Porter damages/health; voicemail to Dr. Clemente and telephone calls with his office; voicemail and telephone calls with Ms. Porter regarding Dr. Clemente
6/29/2005	Schumacher, David	240.00	0.60	144.00	Draft discovery requests; communications with opposing counsel.
6/29/2005	Bapooji, Anita	240.00	3.10	744.00	Telephone calls with Ms. Porter regarding discovery issues; revise document requests and emails with Mr. Schumacher regarding same; email and telephone call with Mr. Schumacher regarding supplemental initial disclosures; read fax from Ms. Porter; read correspondence from Ms. Caulo regarding document requests; draft letter to Ms. Caulo with second set of document requests; telephone call with Mr. Schumacher regarding requests for admissions; telephone call with Ms. Porter regarding discovery issues; review supplemental initial disclosures and email to Mr. Schumacher regarding same; work on discovery matters.
6/30/2005	Bapooji, Anita	240.00	0.80	192.00	Telephone calls with Ms. Porter regarding discovery items; telephone call with Ms. Porter regarding Dr. Clemente and emails with Mr. Savage and Mr. Schumacher regarding same; draft letter to Ms. Caulo



<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
7/1/2005	Schumacher, David	240.00	1.60	384.00	Review Baron, Feliz and other materials from Jim Brady related to policy of retaliation/analyze and discuss Cabral approach w/Mr. Savage
7/1/2005	Savage, Joseph	380.00	0.30	114.00	Emails with Mr. Schumacher regarding discovery; telephone conference with Mr. Giedt; telephone conference with Mr. Schumacher.
7/5/2005	Bapooji, Anita	240.00	4.00	960.00	Emails with Mr. Savage and Mr. Schumacher regarding Mr. Rosario's injuries and discovery responses from U.S. Attorney's office; draft report for Dr. Clemente and research for same; email draft report to Mr. Savage, Mr. Schumacher and Ms. Porter; voicemail to Ms. Porter regarding same; read court order on motion to file under seal; emails with Mr. Schumacher regarding Dr. Clemente report
7/7/2005	Savage, Joseph	380.00	0.30	114.00	Emails with Mr. Schumacher; telephone conference with Mr. Katz (FBI).
7/7/2005	Bapooji, Anita	240.00	0.20	48.00	Telephone call with Mr. Giedt regarding discovery requests.
7/12/2005	Bapooji, Anita	240.00	0.10	24.00	Telephone call with Ms. Porter regarding status update.
7/14/2005	Savage, Joseph	380.00	0.20	76.00	Telephone conference with AUSA B. Kelly regarding Touhy request.
7/18/2005	Schumacher, David	240.00	0.50	120.00	Review Sheriff Department's motion to compel; review protective order.
7/21/2005	Bapooji, Anita	240.00	0.10	24.00	Telephone call with Ms. Porter re: damages; email to Mr. Schumacher and Mr. Savage regarding same
7/25/2005	Schumacher, David	240.00	0.20	48.00	Communications with USAO re: Touhy.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
7/27/2005	Schumacher, David	240.00	1.30	312.00	Communications with Mr. Giedt; review Touhy letter response; review Jurdak deposition.
7/28/2005	Savage, Joseph	380.00	0.10	38.00	Telephone conference with Mr. Schumacher regarding subsequent remedial measures/S220 application.
8/1/2005	Schumacher, David	240.00	0.20	48.00	Communications with Ms. Caulo re: motion to compel and other outstanding discovery issues.
8/1/2005	Bapooji, Anita	240.00	0.10	24.00	Telephone call with Ms. Porter regarding update re: informer's privilege and damages
8/3/2005	Savage, Joseph	380.00	0.20	76.00	Review letter from the F.B.I.; telephone conference with Mr. Schumacher.
8/9/2005	Schumacher, David	240.00	5.60	1,344.00	Review depositions; review Suffolk County Sheriff's Department motion to compel; communications with Mr. Giedt; communications with Mr. Savage regarding motion to compel.
8/11/2005	Schumacher, David	240.00	3.60	864.00	Research and draft motion to compel discovery from FBI/USAO; telephone conference with Mr. Giedt.
8/20/2005	Savage, Joseph	380.00	0.10	38.00	Review Responses to Request for Admissions.
8/22/2005	Schumacher, David	240.00	3.00	720.00	Draft letter to Ms. Caulo; review discovery responses; telephone conference with Ms. Caulo re: discovery issues.
8/26/2005	Savage, Joseph	380.00	0.20	76.00	Review letters to Ms. Caulo; telephone conference with Mr. Schumacher; emails with Mr. Schumacher regarding Cabral cross examination.
8/28/2005	Savage, Joseph	380.00	0.20	76.00	Review motion to compel response by the Department of Justice.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
8/29/2005	Schumacher, David	240.00	5.90	1,416.00	Review FBI's response to motion to compel and document production; review correspondence from Ms. Caulo; communications with Mr. Savage and Ms. Porter.
8/29/2005	Savage, Joseph	380.00	0.10	38.00	Emails with Mr. Schumacher; review discovery produced by FBI.
9/13/2005	Schumacher, David	240.00	3.10	744.00	Draft and file motion to compel discovery from SCSD.
9/14/2005	Savage, Joseph	380.00	0.10	38.00	Conference with Mr. McNeil; emails and telephone conference with Mr. Schumacher regarding motion.
9/21/2005	Schumacher, David	240.00	0.80	192.00	Communications with Mr. Savage, Mr. Giedt, opposing counsel and client regarding motion hearing.
9/26/2005	Savage, Joseph	380.00	1.00	380.00	Conference with Mr. Schumacher; prepare for motion hearing; telephone conference with Mr. Giedt.
9/27/2005	Savage, Joseph	380.00	3.30	1,254.00	Prepare for motion hearing; telephone conference with Mr. Schumacher.
9/28/2005	Savage, Joseph	380.00	3.40	1,292.00	Prepare for and attend motion to compel hearing.
9/29/2005	Schumacher, David	240.00	3.90	936.00	Communications with opposing counsel and government regarding motions to compel; draft APA action; communications with client.
9/29/2005	Savage, Joseph	380.00	0.20	76.00	Emails and telephone conference with Mr. Schumacher; review documents; telephone conference with Mr. Giedt.
9/29/2005	Sweet, James	240.00	0.90	216.00	Draft APA action.
10/3/2005	Savage, Joseph	380.00	0.40	152.00	Telephone conference with Mr. Giedt; review discovery material.
10/3/2005	Sweet, James	240.00	2.60	624.00	Draft APA action.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
10/4/2005	Savage, Joseph	380.00	0.10	38.00	Telephone conference with Ms. Caulo; emails with Ms. Porter regarding SCSD motion to compel (informant info).
10/7/2005	Savage, Joseph	380.00	0.40	152.00	Review U.S. Attorney's Office letter; emails with Ms. Porter regarding same; review date requests; emails with Ms. Porter; emails with Mr. Schumacher.
10/11/2005	Schumacher, David	240.00	3.20	768.00	Communications with Mr. Savage, Mr. Giedt, opposing counsel; review S-220 violations chart.
10/12/2005	Schumacher, David	240.00	1.20	288.00	Communications with Mr. Savage and Ms. Caulo regarding motion to compel.
10/14/2005	Savage, Joseph	380.00	0.20	76.00	Review motion to compel; emails with Mr. Schumacher regarding discovery.
10/15/2005	Savage, Joseph	380.00	0.20	76.00	Review grand jury disclosure memorandum.
10/17/2005	Savage, Joseph	380.00	0.30	114.00	Emails with Mr. Schumacher regarding 6(e) motion; conference with Mr. Schumacher regarding motion to compel.
10/18/2005	Savage, Joseph	380.00	0.20	76.00	Telephone conference with Ms. Caulo; review summary judgment motion.
11/2/2005	Schumacher, David	240.00	8.10	1,944.00	Prepare summary judgment oppositions; review depositions; communications with witnesses.
11/2/2005	Sweet, James	240.00	1.10	264.00	Draft Section 1983 section of summary judgment opposition.
11/4/2005	Savage, Joseph	380.00	0.10	38.00	Review summary judgment issues.
11/8/2005	Schumacher, David	240.00	3.80	912.00	Draft Statement of Disputed Facts for SCSD summary judgment. Opposition
11/15/2005	Savage, Joseph	380.00	0.70	266.00	Conference with Mr. Schumacher re: summary judgment; telephone conference with Ms. Caulo; prepare for hearing.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
11/16/2005	Schumacher, David	240.00	7.40	1,776.00	Draft Opposition to motion to compel; research and draft petition for grand jury materials.
11/16/2005	Savage, Joseph	380.00	0.40	152.00	Emails with Mr. Schumacher regarding motions to compel; review motion response by Department of Justice.
11/17/2005	Savage, Joseph	380.00	0.20	76.00	Conference with Mr. Giedt; emails with Mr. Schumacher.
11/18/2005	Savage, Joseph	380.00	0.20	76.00	Review 6(e) motion; prepare for hearing
11/21/2005	Savage, Joseph	380.00	0.20	76.00	Telephone conference with Mr. Schumacher, Mr. Giedt and Mr. McNeil.
11/22/2005	Savage, Joseph	380.00	3.00	1,140.00	Prepare for and attend motion hearing; telephone conference with Mr. McNeil.
11/28/2005	Savage, Joseph	380.00	0.30	114.00	Conference and telephone conference with Mr. Schumacher regarding motions by the U.S. Attorney's office; review Reply Brief by Suffolk County Sheriff's Department.
11/30/2005	Savage, Joseph	380.00	0.40	152.00	Emails regarding Summary Judgment; prepare for Summary Judgment hearing
12/3/2005	Savage, Joseph	380.00	0.30	114.00	Prepare for summary judgment argument.
12/4/2005	Savage, Joseph	380.00	0.50	190.00	Summary Judgment hearing preparation.
12/5/2005	Savage, Joseph	380.00	2.20	836.00	Conference with Mr. Schumacher; review <i>Touhy</i> response; prepare for summary judgment hearing; emails with Mr. Schumacher regarding same; telephone conference with Mr. McNeil.
12/6/2005	Savage, Joseph	380.00	0.40	152.00	Review <i>Touhy</i> responses; emails with Mr. Schumacher regarding same; prepare for hearing.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
12/7/2005	Savage, Joseph	380.00	0.30	114.00	Telephone conference with Mr. McNeil; emails with Mr. Schumacher regarding Keeley; emails regarding Keeley testimony; prepare summary judgment argument.
12/8/2005	Savage, Joseph	380.00	0.40	152.00	Review motion to strike; review response to motion to strike.
12/12/2005	Savage, Joseph	380.00	2.10	798.00	Prepare for summary judgment argument; conference with Mr. Schumacher regarding same.
12/13/2005	Sweet, James	240.00	1.80	432.00	Prepare research memoranda and talking points for Mr. Savage for summary judgment hearing; attn to Opposition to Motion to Strike
12/14/2005	Savage, Joseph	380.00	2.10	798.00	Prepare for summary judgment hearing; emails regarding same; review <i>Touhy</i> and grand jury materials for same.
12/15/2005	Schumacher, David	240.00	3.90	936.00	Attend summary judgment hearing, prepare for same.
12/15/2005	Savage, Joseph	380.00	4.10	1,558.00	Prepare for summary judgment; hearing on summary judgment; review Boston Phoenix article regarding SCSD and Porter.
12/16/2005	Savage, Joseph	380.00	3.60	1,368.00	Trial preparation: formulate witness list, review jury instructions; telephone conference with Mr. Schumacher; telephone conference with Ms. Caulo; conference with Mr. Schumacher; telephone conference with Mr. MacNeil; telephone conference with Mr. Giedt.
12/17/2005	Savage, Joseph	380.00	1.90	722.00	Trial preparation: draft opening; review witness list, identify exhibits; emails with Mr. Schumacher regarding same; emails with Ms. Porter.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
12/18/2005	Savage, Joseph	380.00	1.00	380.00	Trial preparation; deposition review; emails with Mr. Schumacher regarding same; emails regarding Touhy; draft opening/closing; adjust witness order; select exhibits.
12/19/2005	Schumacher, David	240.00	8.80	2,112.00	Communications with clerk and opposing counsel regarding scheduling; begin drafting joint pre-trial memorandum; contact witnesses; review documents to pick exhibits.
12/19/2005	Savage, Joseph	380.00	1.10	418.00	Telephone conference and emails with Mr. Schumacher; trial preparation; review draft pretrial order.
12/19/2005	Sweet, James	240.00	0.90	216.00	Research punitive damages.
12/20/2005	Schumacher, David	240.00	7.80	1,872.00	Trial preparation; create task list; review pretrial memoranda in other cases, review local rule on pretrial memorandum, draft pretrial memorandum, select exhibits, contact witnesses, review research and pleadings.
12/20/2005	Savage, Joseph	380.00	6.00	2,280.00	Trial preparation: deposition and document review; conference with Mr. Schumacher et al, consider stipulations; winnow exhibits; review pretrial memorandum draft.
12/20/2005	Sweet, James	240.00	2.10	504.00	Research municipal liability for deliberate indifference and for policy decision; draft memorandum regarding same.
12/21/2005	Schumacher, David	240.00	9.70	2,328.00	Trial preparation: draft pretrial memoranda, draft undisputed facts, choose exhibits, contact witnesses.
12/21/2005	Sweet, James	240.00	5.60	1,344.00	Draft statement of law; draft jury charge; discuss county liability with Mr. Savage.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
12/29/2005	Schumacher, David	240.00	13.10	3,144.00	Trial preparation: draft motions in limine, final draft of pretrial memorandum; communications with witnesses, draft and serve subpoenas, conference with opposing counsel.
12/29/2005	Savage, Joseph	380.00	10.70	4,066.00	Trial preparation; conference with Porter family witnesses; conference with Caulo; review trial memorandum; voir dire; jury instructions.
12/29/2005	Sweet, James	240.00	8.30	1,992.00	Draft jury charge; draft voir dire; draft Motion in Limine (collateral estoppel); draft Motion in Limine (advice of counsel); discuss case with Ms. Caulo; research official v. individual capacity.
12/29/2005	Boivin, Andrea	110.00	5.00	550.00	Review Pre-Trial Order and Pre-Trial Memorandum; t/cs with Mr. Schumacher re same; review Proposed Witness and Exhibit List from opposing counsel; set up Witness Files; gather and copy all proposed exhibits; review pleadings for Mrs. Porter's interrogatory responses, copy and add to file.
12/29/2005	Boivin, Andrea	110.00	4.50	495.00	Add Evidentiary Memos to file, create Motions in Limine File, create Trial Exhibit List from all exhibits listed in Pre-Trial Memo, set up copies of Agreed To and Objected To Exhibits in files.
12/30/2005	Schumacher, David	240.00	8.80	2,112.00	Trial preparation: draft and file pretrial memorandum, motions in limine, requests for jury instructions, communications with witnesses.
12/30/2005	Savage, Joseph	380.00	9.90	3,762.00	Preparation for trial: review depositions and documents; witness outlines.
12/30/2005	Sweet, James	240.00	4.10	984.00	Draft jury charge; draft verdict sheet; draft Opposition to Motion to Bifurcate.



<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
12/31/2005	Savage, Joseph	380.00	7.60	2,888.00	Trial preparation: review depositions and documents; witness outlines; identify cross-examination topics; prepare for potential defense witnesses; assemble cross-examination for each
1/1/2006	Schumacher, David	240.00	6.80	1,632.00	Trial preparation: review defendants' motions in limine; draft responses.
1/1/2006	Savage, Joseph	380.00	8.40	3,192.00	Trial preparation; witness outlines (direct and cross); continue preparation for opening and closing; revise order of witnesses; eliminate witnesses, prepare stipulations.
1/2/2006	Schumacher, David	240.00	12.60	3,024.00	Trial preparation: draft responses to motions in limine; draft witness outlines; update pretrial memo.
1/2/2006	Savage, Joseph	380.00	11.30	4,294.00	Trial preparation: witness preparation; strategy review re. witness order; review Cabral deposition; review Keeley witness outline; narrow exhibit list.
1/2/2006	Sweet, James	240.00	1.60	384.00	Review defendants' proposed jury instructions; review defendants' proposed voir dire.
1/2/2006	Boivin, Andrea	110.00	6.50	715.00	Meet with Litigation Technology Dept. re electronic issues
					Review document productions in Summation; mark each exhibit as Agreed To or Objected To; create index of all Porter reports
					Make copy set of all proposed exhibits for Mr. Savage's review
1/3/2006	Schumacher, David	240.00	11.30	2,712.00	Trial preparation: prepare witness outlines, attention to motions in limine; attend pretrial conference; conference with Ms. Mastrorilli.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
1/3/2006	Savage, Joseph	380.00	6.70	2,546.00	Prepare for and attend pretrial conference; trial preparation: draft letter to Mr. Giedt; conference with Ms. Mastroilli; conference with Ms. Porter
1/3/2006	Sweet, James	240.00	1.30	312.00	Draft Opposition to Jury Charge.
1/4/2006	Schumacher, David	240.00	9.10	2,184.00	Trial preparation: draft witness outlines, communications with witnesses, review exhibits, update pretrial memorandum.
1/4/2006	Boivin, Andrea	110.00	5.50	605.00	Per Pre-Trial Conference rulings, make further edits to Proposed Trial Exhibit List and adjust exhibits accordingly; issue code the document productions in Summation; create word index of Suffolk County's document production; prepare copies of Objected To exhibits; adjust exhibit binders with latest version of list for hearing; have documents recently produced by Suffolk County uploaded to Summation
1/4/2006	Savage, Joseph	380.00	7.90	3,002.00	Trial preparation: finalize opening; review and edit demonstrative exhibits; continue witness outlines
1/4/2006	Sweet, James	240.00	1.10	264.00	Draft Opposition to Jury Charge; draft Amended Opposition to Jury Charge; draft Motion to Reopen Theiss deposition.
1/5/2006	Schumacher, David	240.00	14.90	3,576.00	Attend final pretrial conference; trial preparation: review additional motions in limine, communications with witnesses, update witness outlines, review exhibits; prepare for Leone and Theiss depositions

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
1/5/2006	Savage, Joseph	380.00	9.10	3,458.00	Attend final pretrial conference; Trial preparation: prepare for Leone/Theiss depositions; prepare opening; review exhibits
1/5/2006	Sweet, James	240.00	0.40	96.00	Draft Motion in Limine (Horgan)
1/6/2006	Schumacher, David	240.00	11.80	2,832.00	Gather documents for and attend Leone and Theiss depositions; compare Theiss testimony with previous testimony; prepare witness outlines
1/6/2006	Savage, Joseph	380.00	10.50	3,990.00	Take Leone and Theiss depositions; prepare for same; trial preparation: refine opening, review exhibits and witness list
1/6/2006	Sweet, James	240.00	1.70	408.00	Review and prepare exhibits; file Opposition to Jury Charge.
1/7/2006	Boivin, Andrea	110.00	7.00	770.00	Sticker trial exhibits; meet with Litigation Technology Dept. to have all exhibits scanned into Trial Director; emails to Mr. Berriman re same; have all documents in Summation database migrated to Trial Director.
1/7/2006	Schumacher, David	240.00	7.70	1,848.00	Trial preparation: prepare for Leone and Theiss trial testimony; prepare other witness outlines; communications with witnesses.
1/7/2006	Savage, Joseph	380.00	12.70	4,826.00	Trial preparation: finalize witness selection; refine opening; outline presentation and exhibits.
1/8/2006	Schumacher, David	240.00	9.20	2,208.00	Trial preparation: finalize witness outlines; finalize exhibits; review new SCSD motions in limine; draft motion in limine (Snyder).
1/8/2006	Savage, Joseph	380.00	11.70	4,446.00	Trial preparation: finalize opening; outline presentation and exhibits.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
1/8/2006	Boivin, Andrea	110.00	7.50	825.00	Create copies of Juror Trial Notebooks; re-mark exhibits based on latest changes to Trial Exhibit List; have all exhibits rescanned into Trial Director; prepare copies of exhibits for witnesses direct examinations; meet with Litigation Tech. Dept. to test laptops
					Review and organize all materials for trial
1/9/2006	Schumacher, David	240.00	13.50	3,240.00	Trial day 1: prepare for hearing re: contested exhibits; prepare for voir dire of Mr. Prince; finalize witness outlines
1/9/2006	Savage, Joseph	380.00	11.80	4,484.00	Trial day 1; final review of contested exhibits; voir dire of W. Prince; prepare for same; continue trial preparation (opening statement)
1/9/2006	Boivin, Andrea	110.00	2.50	275.00	Assist Mr. Berriman with electronic document issues; supervise transportation of materials from court to firm; upload latest deposition transcripts to Summation and Trial Director; set up Stipulations File; prepare copies of exhibits for witness direct examinations
1/10/2006	Schumacher, David	240.00	10.60	2,544.00	Trial day 2; trial preparation: finalize witness outlines; gather exhibits and demonstratives for opening; gather exhibits for initial witnesses
1/10/2006	Savage, Joseph	380.00	13.10	4,978.00	Trial day 2 (opening statements, Jurdak, Mastrolilli); trial preparation: review jury charge; review verdict sheet, prepare for upcoming witnesses
1/10/2006	Sweet, James	240.00	0.30	72.00	File proposed jury charge; draft Opposition to Verdict Sheet.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
1/11/2006	Schumacher, David	240.00	12.20	2,928.00	Trial day 3: direct examination of Amy Porter, Christa Snyder, Maureen Robinson stipulation; continue trial preparation: review notes on openings and Jurdak testimony; prepare exhibits and outlines for upcoming witnesses.
1/11/2006	Savage, Joseph	380.00	14.20	5,396.00	Trial day 3: Mastrorilli, Keeley; trial preparation: prepare for upcoming witnesses. review exhibits
1/11/2006	Boivin, Andrea	110.00	3.50	385.00	Assist Mr. Beriman with electronic document issues; supervise transportation of materials from court to firm; review and print financial documents; print Rosario case file documents for Mr. Savage
1/12/2006	Schumacher, David	240.00	11.80	2,832.00	Trial day 4: direct examination of Amy Porter and John Porter; trial preparation: prepare for day 2 of Ms. Porter's testimony; review exhibits
1/12/2006	Savage, Joseph	380.00	11.20	4,256.00	Trial day 4: direct examination (Theiss, Leone, S. Porter); trial preparation: prepare for rest of S. Porter testimony; prepare for Cabral examination
1/12/2006	Sweet, James	240.00	0.60	144.00	Draft memorandum on charging conference.
1/13/2006	Schumacher, David	240.00	9.60	2,304.00	Trial day 5; trial preparation: prepare for Cabral testimony; review testimony to date
1/13/2006	Savage, Joseph	380.00	8.90	3,382.00	Trial day 5: finish S. Porter direct examination; trial preparation: prepare for Cabral cross; review exhibits; review testimony
1/14/2006	Savage, Joseph	380.00	11.50	4,370.00	Trial preparation; cross examination and closing; jury instructions; emails regarding same.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
1/15/2006	Savage, Joseph	380.00	12.20	4,636.00	Trial preparation: cross examination (Cabral); motions in limine; closing.
1/16/2006	Schumacher, David	240.00	5.80	1,392.00	Trial preparation: review notes of testimony; review Cabral deposition; prepare exhibits for Cabral cross-examination.
1/16/2006	Savage, Joseph	380.00	10.20	3,876.00	Trial preparation: prepare closing; prepare motions in limine.
1/16/2006	Boivin, Andrea	110.00	2.70	297.00	Prepare Rosario case file; prepare copies of exhibits for witness cross-examination; review list of admitted exhibits; substitute trial exhibits with redacted versions
1/17/2006	Savage, Joseph	380.00	9.70	3,686.00	Trial day 6: Cabral cross-examination; trial preparation: finalize closing argument; review testimony
1/17/2006	Schumacher, David	240.00	11.30	2,712.00	Trial day 6; trial preparation: review notes of testimony; prepare exhibits for closing argument; review jury instructions and research on damages.
1/18/2006	Savage, Joseph	380.00	9.20	3,496.00	Trial day 7: deliver closing argument; trial preparation: finalize closing, prepare for charge conference.
1/18/2006	Schumacher, David	240.00	6.90	1,656.00	Trial day 7; trial preparation: prepare exhibits for closing; research for charge conference; review testimony
1/19/2006	Savage, Joseph	380.00	3.90	1,482.00	Trial day 8: receive jury questions; receive jury verdict; conference with Ms. Porter; review exhibits.
1/19/2006	Schumacher, David	240.00	3.80	912.00	Trial day 8: receive jury questions; receive jury verdict; research attorneys' fee petition
1/20/2006	Savage, Joseph	380.00	2.20	836.00	Research and communications re: attorneys' fee petition

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
1/22/2006	Savage, Joseph	380.00	0.40	152.00	Review materials re: fee petition; strategize re: post trial motions; emails regarding same.
1/23/2006	Schumacher, David	240.00	2.50	600.00	Research fee petition; communications with opposing counsel regarding settlement.
1/23/2006	Savage, Joseph	380.00	1.00	380.00	Review materials and communications re: fee petition
1/23/2006	Sweet, James	240.00	0.50	120.00	Draft Opposition to Motion for New Trial.
1/24/2006	Schumacher, David	240.00	2.50	600.00	Research and draft attorney fee petition; communications with opposing counsel regarding settlement.
1/24/2006	Savage, Joseph	380.00	1.00	380.00	Fee petition work; settlement conference call.
1/25/2006	Schumacher, David	240.00	3.50	840.00	Research attorneys' fee petition; communications with civil rights attorneys to discuss rates and hours.
1/27/2006	Schumacher, David	240.00	2.80	672.00	Research and draft fee petition; prepare Bill of Costs.
1/27/2006	Savage, Joseph	380.00	0.50	190.00	Review new trial motion; fee petition.
1/30/2006	Schumacher, David	240.00	2.80	672.00	Draft fee petition; communications with Ms. Caulo regarding settlement and confer on motions; review bill.
1/31/2006	Schumacher, David	240.00	3.80	912.00	Draft fee petition; draft Savage affidavit; draft affidavits; review bill.
2/1/2006	Schumacher, David	240.00	1.80	432.00	Draft affidavits for fee petition and draft fee petition; draft motion for extension.
2/2/2006	Schumacher, David	240.00	1.50	360.00	Draft affidavits; draft fee petition; communications with attorneys regarding same.
2/2/2006	Savage, Joseph	380.00	1.00	380.00	Fee petition; review post trial motions.
2/2/2006	Sweet, James	240.00	0.50	120.00	Review Motion for New Trial.
2/3/2006	Schumacher, David	240.00	2.50	600.00	Review opposition to new trial; draft affidavits for fee petition.
2/3/2006	Savage, Joseph	380.00	0.50	190.00	Work on new trial motion.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
2/3/2006	Sweet, James	240.00	3.00	720.00	Review Motion for New Trial; draft opposition to same.
2/5/2006	Schumacher, David	240.00	0.70	168.00	Review withheld Mastroilli memorandum; draft letter to opposing counsel regarding same.
2/6/2006	Sweet, James	240.00	3.50	840.00	Draft Opposition to Motion for New Trial.
2/7/2006	Schumacher, David	240.00	1.50	360.00	Submit bill to opposing counsel; draft fee petition.
2/8/2006	Savage, Joseph	380.00	0.50	190.00	New trial motion; fee petition.
2/9/2006	Schumacher, David	240.00	2.50	600.00	Draft opposition to motion for new trial.
2/9/2006	Sweet, James	240.00	2.80	672.00	Continue drafting Opposition to Motion for New Trial.
2/11/2006	Savage, Joseph	380.00	1.20	456.00	New trial brief.
2/13/2006	Schumacher, David	240.00	3.50	840.00	Draft opposition to motion for new trial; draft motion to defer fee petition.
2/13/2006	Sweet, James	240.00	4.50	1,080.00	Draft Opposition to Motion for New Trial.
2/15/2006	Schumacher, David	240.00	3.00	720.00	Draft Opposition to Motion for New Trial.
2/15/2006	Sweet, James	240.00	3.80	912.00	Continue drafting Opposition to Motion for New Trial.
2/16/2006	Schumacher, David	240.00	1.80	432.00	Draft and file opposition to motion for new trial.
2/17/2006	Schumacher, David	240.00	0.50	120.00	Communications with Ms. Caulo regarding attorneys' fees; refine bill.
2/22/2006	Schumacher, David	240.00	0.90	216.00	Communications with Mr. Savage regarding fee petition; update fee petition; refine bill for conference with Ms. Caulo.
3/8/2006	Schumacher, David	240.00	0.30	72.00	Confer with Ms. Caulo regarding attorneys' fees; communications with Mr. Savage regarding same.
3/9/2006	Schumacher, David	240.00	0.30	72.00	Communications with Secretary of State regarding Public Records Act request for SCSD attorneys' fees
3/15/2006	Schumacher, David	240.00	0.50	120.00	Draft letter to opposing counsel regarding fee petition.



<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
3/22/2006	Savage, Joseph	380.00	0.20	76.00	Emails with Ms. Porter regarding preparation of fee petition; review Ms. Caulo's letter re: refusal to settle
3/28/2006	Schumacher, David	240.00	0.40	96.00	Draft letter to Ms. Caulo.
4/3/2006	Schumacher, David	240.00	0.40	96.00	Draft letter to Ms. Caulo attaching recent Goodwin attorney fee decision.
4/7/2006	Schumacher, David	240.00	0.80	192.00	Telephone conference with Ms. Caulo regarding attorneys' fees and withheld document; draft letter regarding same; review letter from Ms. Caulo; communications with Mr. Kiley regarding Mastrorilli document.
4/7/2006	Savage, Joseph	380.00	0.30	114.00	Telephone conference with Mr. Schumacher regarding Ms. Caulo's response; emails regarding same; review letters from Ms. Caulo
4/12/2006	Savage, Joseph	380.00	0.20	76.00	Review emails regarding SCSD staff changes
4/14/2006	Schumacher, David	240.00	0.40	96.00	Review Secretary's response to PRA request.
4/24/2006	Schumacher, David	240.00	0.20	48.00	Communications with Ms. Murphy regarding PRA; review correspondence regarding same.
4/24/2006	Savage, Joseph	380.00	0.20	76.00	Emails and fax from Attorney General regarding PR request appeal.
4/29/2006	Savage, Joseph	380.00	0.10	38.00	Emails regarding recent s. 1983 verdict.
5/1/2006	Schumacher, David	240.00	0.30	72.00	Communications with Mr. Homsy regarding Public Records Act
5/1/2006	Savage, Joseph	380.00	0.10	38.00	Emails with Mr. Schumacher regarding records act response from SCSD
5/3/2006	Schumacher, David	240.00	1.50	360.00	Review Suffolk County Sheriff's Department billing records for fee petition
5/10/2006	Schumacher, David	240.00	0.90	216.00	Draft letter to Ms. Caulo regarding settlement; review letter in response.

<u>Date</u>	<u>Attorney</u>	<u>Rates</u>	<u>Base Hours</u>	<u>Base Fees</u>	<u>Description</u>
5/11/2006	Schumacher, David	240.00	0.40	96.00	Communications regarding attorney fee settlement.
5/19/2006	Schumacher, David	240.00	1.00	240.00	Update attorneys' fee bill.
5/22/2006	Schumacher, David	240.00	3.40	816.00	Draft substituted opposition to motion for new trial; review transcript for same; update fees bill for Ms. Caulo
5/23/2006	Schumacher, David	240.00	1.60	384.00	Review transcripts for motion for new trial; disseminate correspondence to Ms. Caulo regarding attorney fees.
5/24/2006	Schumacher, David	240.00	1.80	432.00	Review transcript for opposition to motion for new trial
5/24/2006	Savage, Joseph	380.00	0.10	38.00	Court order regarding settlement issue; letter to Ms. Caulo regarding fees.
5/26/2006	Schumacher, David	240.00	0.50	120.00	Attend status conference
5/27/2006	Savage, Joseph	380.00	0.20	76.00	Update on hearing; review fee petition; review proposal to settle; fee petition.
5/30/2006	Schumacher, David	240.00	4.10	984.00	Update attorneys' fee bill; draft settlement letter to Ms. Caulo; conference with Mr. Savage regarding same; research remittitur standard for motion for new trial.
5/30/2006	Savage, Joseph	380.00	0.20	76.00	Conference with Mr. Schumacher regarding new trial motion; email/telephone call regarding fee petition settlement proposal.
5/31/2006	Schumacher, David	240.00	1.50	360.00	Attention to fee petition; update bill of costs and Mr. Berriman's fees; communications w/Mr. Savage re: Motion for a New Trial.
6/1/2006	Schumacher, David	240.00	1.80	432.00	Attention to fee petition; update bill and draft another settlement letter to Ms. Caulo.
6/1/2006	Savage, Joseph	380.00	0.60	228.00	Emails regarding Garcetti case; review same and prepare new trial motion response.

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